

# United States District Court

EASTERN DISTRICT OF MICHIGAN-SD

UNITED STATES OF AMERICA

V.

JAMES WATSON

## CRIMINAL COMPLAINT

CASE NUMBER: 06-30461

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 27, 2006 in Wayne county, in the Eastern District of Michigan-SE defendants(s) did, (Track Statutory Language of Offense)

While being a Postal Service employee, embezzle mail and the contents therein, which had come into his possession intended to be conveyed by mail and delivered through a Postal Office of the United States,

in violation of Title 18 United States Code, Section(s) 1709

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:  
Official Title

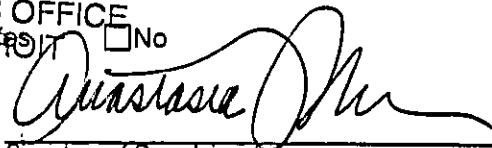
SEE ATTACHED AFFIDAVIT

FILED  
OCT 4 - 2006

CLERK'S OFFICE

☒ Yes ☐ No

Continued on the attached sheet and made a part hereof:

  
Signature of Complainant  
ANASTASIA, V. NERGER, SPECIAL AGENT  
UNITED STATES POSTAL SERVICE, OFFICE OF  
INSPECTOR GENERAL, INVESTIGATIONS

Sworn to before me and subscribed in my presence,

October 4, 2006

at


Date

Detroit, Michigan

City of State

R. STEVEN WHALEN

Name and Title of Judicial Officer

  
Signature of Judicial Officer

## AFFIDAVIT

I, Anastasia V. Nerger, am a Special Agent for the U.S. Postal Service, Office of Inspector General, and have been so employed for four years, having spent the previous fourteen years as a Special Agent for the U. S. Department of Agriculture, Office of Inspector General. I am currently assigned to the Detroit, MI office, and investigate internal crimes including mail theft by U. S. Postal Service employees. I know the following to be true from personal investigation and knowledge and from investigation by other OIG Special Agents:

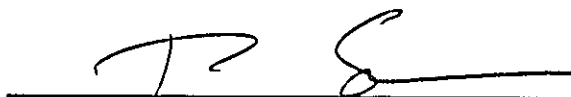
1. In September, 2006, the USPS-OIG received information from a private citizen in the Detroit, MI area that rifled, greeting card mail had been found, on several occasions, in a trash container near Lafayette and Cass Streets, Detroit, MI. Further investigation determined that the mail had been deposited in two USPS collection boxes located on City Carrier James E. Watson's assigned mail collection route and that Watson was assigned to collect the mail on those dates.
2. On September 27, 2006, special agents prepared a test envelope addressed to Sandra Campbell, at a deliverable address, in Sterling Heights, MI. The test envelope contained a greeting card, \$20.00 in U.S. currency, and an electronic monitoring device. The electronic monitoring device would alert special agents if someone opened and removed the contents of the envelope.
3. On September 27, 2006, at approximately 3:25pm, special agents placed the test letter in a mail receptacle located at the McNamara Federal Building, Detroit, MI. The test letter was monitored and at approximately 3:40pm, James E. Watson collected the mail from the receptacle which included the test letter. Watson then left the building and entered a Postal Service vehicle. At approximately 3:45pm, special agents detected the device in the alarm mode, indicating the letter had been opened. Special agents then followed the vehicle approximately two blocks and approached Watson. Agents identified themselves and interviewed Watson after advising him of his Miranda Rights. Watson acknowledged he understood each of these rights. Watson admitted taking the test letter, throwing the envelope out the vehicle window and placing the \$20.00 in currency in his left sock. Watson voluntarily turned over the currency to special agents. Special Agents recovered the greeting card and electronic monitoring device inside the Postal vehicle.

4. Watson further admitted stealing greeting cards and NetFlix DVD's from the mail for approximately six months. Watson estimated that during this six month period he had stolen approximately \$1000.00 to \$1,200.00 in U.S. currency which was contained in the stolen greeting cards. Watson also estimated he had stolen 20 to 30 Netflix DVD's. Watson admitted that he began stealing to support his substance abuse problem. Upon consenting to empty his pockets, Watson removed a small packet of crack cocaine from his front right pants pocket.
5. Based on the foregoing, there is probable cause that James E. Watson while a Postal Service employee, stole mail and the contents of mail entrusted to him, which was intended to be conveyed by mail and intended to be delivered by a Post Office of the United States in violation of U.S.C. 1709.



Anastasia V. Nerger, Special Agent, USPS-OIG

Subscribed and sworn to before me this 4<sup>th</sup>  
Day of October, 2006.



U.S. Magistrate/Judge